

**FILED**UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

MAR 16 2020

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	CRIMINAL NO 26-972 WJ
vs.	)	Count 1: 18 U.S.C. §§ 1153 and
<b>TRUDY MARTINEZ,</b>	)	1112(a): Voluntary Manslaughter;
Defendant.	)	Count 2: 18 U.S.C. § 924(c)(1)(A)(iii):
	)	Using and Carrying, a Firearm During and
	)	in Relation to a Crime of Violence,
	)	and Possessing a Firearm in Furtherance of
	)	Such Crime; Discharging Said Firearm.
	)	

**INFORMATION**

The United States Attorney charges:

**Count 1**

On or about April 26, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **TRUDY MARTINEZ**, an Indian, upon sudden quarrel and therefore without malice, unlawfully killed Jane Doe.

In violation of 18 U.S.C. §§ 1153 and 1112(a).

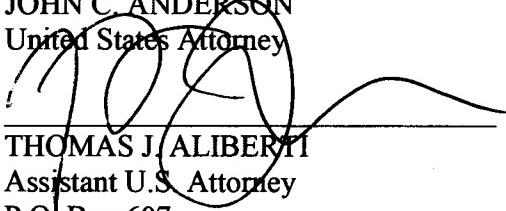
**Count 2**

On or about April 26, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **TRUDY MARTINEZ**, knowingly used, and carried a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, voluntary manslaughter as charged in Count 1 of this information, and in furtherance of such crime, and the firearm was discharged.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii).

**FORFEITURE ALLEGATIONS**

Upon conviction of the offense alleged in this Information, the defendant, **TRUDY MARTINEZ**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) any interest she may have in an AR-15 Bushmaster Model BK5037442 rifle with the serial number XM15-E25 and twenty (20) rounds of 5.56mm Winchester brand ammunition.

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